

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001

As relates to: 03 MDL 1570 (GBD) (SN)

ROBERTA AGYEMAN, et al.

PLAINTIFFS,

v.

ISLAMIC REPUBLIC OF IRAN,

DEFENDANT.

Civil Docket Number: 18-cv-05320

SECOND NOTICE OF AMENDMENT

ECF CASE

This document relates to:

Roberta Agyeman et al. v. Islamic Republic of Iran, No. 1:18-cv-05320 (GBD) (SN).

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 7 (the “Underlying Complaint”), as permitted and approved by the Court’s Order of May 25, 2018, ECF No. 4010, read with the Order dated April 27, 2018, ECF No. 3982. Upon the filing of this Notice of Amendment, the Underlying Complaint is deemed amended to add the individuals listed below (the “New Plaintiffs”) as plaintiffs raising claims against the Islamic Republic of Iran, and adopting the factual allegations, jurisdictional allegations, and jury trial demand of the Underlying Complaint and *Burnett* Iran Complaint, Docket Number 15-cv-9903 (S.D.N.Y.) (GBD)(SN) (ECF Doc. No. 53), as well as all causes of action specified below. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the Underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

CAUSES OF ACTION

The New Plaintiffs hereby adopt and incorporate herein by reference the causes of action set forth in the Underlying Complaint and the *Burnett Iran* Complaint, Docket Number 15-cv-9903 (S.D.N.Y.) (GBD)(SN) (ECF Doc. No. 53).

New Plaintiffs are making such claim on the following basis, and incorporate by reference that supplemental information provided in the Identification of New Plaintiffs below, identifying the New Plaintiffs asserted basis for participating in this suit:

- Estate Wrongful Death Claim by Estate Representative on Behalf of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks
- Solatium Claim by Immediate Family Member of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks
- Personal Injury Claim by Individual Injured as a result of the September 11, 2001 Terrorist Attacks

IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the Underlying Complaint discussing the decedent and/or the decedent's estate.

	New Plaintiff's Last Name, First Name	State of Residency at Filing (or death)	Citizenship/ Nationality on 9/11/2001	Decedent's Name (alphabetical by last name)	New Plaintiff's Relationship to Decedent	Paragraphs of Complaint Discussing Decedent
						1:18-cv-05320
123	Baierwalter, Richard	NY	United States	Bairwalter, Robert J.	Son	¶ 21
124	Schlowinski, Maureen	NY	United States	Bairwalter, Robert J.	Sister	¶ 21

	New Plaintiff's Last Name, First Name	State of Residency at Filing (or death)	Citizenship/ Nationality on 9/11/2001	Decedent's Name (alphabetical by last name)	New Plaintiff's Relationship to Decedent	Paragraphs of Complaint Discussing Decedent
						1:18-cv-05320
125	Barnes, Daniel	NY	United States	Barnes, Matthew	Brother	¶ 22
126	Barnes, Russell	NY	United States	Barnes, Matthew	Brother	¶ 22
127	Barnes, Denise	NY	United States	Barnes, Matthew	Sister	¶ 22
128	Barnes, Suzanne	NY	United States	Barnes, Matthew	Sister	¶ 22
129	Barnes, Jesse	NY	United States	Barnes, Matthew	Son	¶ 22
130	Barnes, Thomas	NY	United States	Barnes, Matthew	Son	¶ 22
131	Barnes Jr., Matthew	NY	United States	Barnes, Matthew	Son	¶ 22
132	Mell, Yvette	NY	United States	Barnes, Matthew	Mother	¶ 22
133	Barnes-Murrell, Christine	NY	United States	Barnes, Shelia P.	Daughter	¶ 23
134	Barnes-Robinson, Zulemana	NY	United States	Barnes, Shelia P.	Daughter	¶ 23
135	Bowen, Alexandra	FL	United States	Bowen, Donna	Daughter	¶ 32
136	Bowen, Anastasia	FL	United States	Bowen, Donna	Daughter	¶ 32
137	Bowen, Eugene Jr.	FL	United States	Bowen, Donna	Son	¶ 32
138	Gordon, Dior P.	NY	United States	Bowers, Veronique N.	Son	¶ 33
139	Caballero, Claudia	TX	United States	Caballero, Daniel M.	Sister	¶ 36
140	Caballero, Andres	TX	United States	Caballero, Daniel M.	Father	¶ 36
141	Spencer, Sabrina C.	NY	United States	Cachia, Brian	Mother	¶ 37
142	Cachia, Jamie	NY	United States	Cachia, Brian	Sister	¶ 37

	New Plaintiff's Last Name, First Name	State of Residency at Filing (or death)	Citizenship/ Nationality on 9/11/2001	Decedent's Name (alphabetical by last name)	New Plaintiff's Relationship to Decedent	Paragraphs of Complaint Discussing Decedent
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143	Branch, Rhonda	U.S. V.I.	United States	Calixte, Felix	Sister	¶ 42
144	Calixte, Peter Anderson	U.S. V.I.	United States	Calixte, Felix	Brother	¶ 42
145	DeSouza, Nina	TX	United States	Calixte, Felix	Sister	¶ 42
146	Armstrong, Martin	CO	United States	Calixte, Felix	Brother	¶ 42
147	Williams, Terra	LA	United States	Calixte, Felix	Sister	¶ 42

Dated: June 26, 2018

Respectfully submitted,

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COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2018, I caused the foregoing Notice of Amendment, to be served via the Court's ECF system to all counsel of record in Case Number 03-MDL-1570 (GBD) (SN).



Jerry S. Goldman